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IRVING MALCHMAN, OF COUNSEL

March 29, 2005

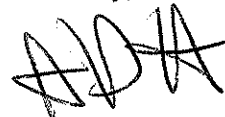
Sarah A. Thornton  
Clerk of the Court  
United States District Court for the District of Massachusetts  
John Joseph Moakley U.S. Courthouse  
Suite 2300  
1 Courthouse Way  
Boston, MA 02210

**Re: In re Pharmaceutical Industry Average Wholesale Price Litigation MDL No. 1456**  
**This document relates to: *County of Suffolk v. Abbott Laboratories Inc., et al.*;**  
**Case No. 2:03cv229**

Dear Ms. Thornton:

Enclosed please find a check in the amount of \$50 on behalf of Plaintiff County of Suffolk to cover the fees for admission of attorney Michael Coons *Pro Hac Vice*. Also enclosed is a copy of the Motion to Admit Michael Coons *Pro Hac Vice*, which has been filed electronically using ECF. Under paragraph 16 of the Court's Case Management Order No. 1 in this matter, no appearance by Massachusetts counsel is required.

Sincerely,



Aaron D. Hovan

Enclosure

- UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

5. Mr. Coons Certificate in Support Of Motion To Permit Counsel To Appear Pro Hac Vice is attached hereto behind Tab A; a Proposed Order is attached behind Tab B.

Respectfully submitted,

KIRBY McINERNEY & SQUIRE, LLP

Dated: 03/29/05

By:



Joanne M. Cicala

Aaron D. Hovan

830 Third Avenue

New York, N.Y. 10022

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COUNSEL FOR PLAINTIFF THE  
COUNTY OF SUFFOLK

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESAL PRICE  
LITIGATION

MDL NO. 1456

THIS DOCUMENT RELATES TO:  
*County of Suffolk v. Abbott Laboratories  
Inc., et al.*, 2:03cv229

CIVIL ACTION  
NO. 01-12257-PBS

Judge Patti B. Saris

## PRO HAC VICE DECLARATION OF MICHAEL COONS

1. I am and have been a member in good standing of the bar of the United States District Court for the Northern District of Illinois;
2. I am and have been a member in good standing of the bar of the United States District Court for the Southern District of New York since 2003;
3. I am and have been a member in good standing of the bar of the State of New York since 2002;
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction;
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Dated: 03/29/05

A handwritten signature in black ink, appearing to read "Michael Coons", written over a horizontal line.

Michael Coons

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# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESALE PRICE	)	MDL NO. 1456
LITIGATION	)	
_____	)	
	)	CIVIL ACTION
THIS DOCUMENT RELATES TO:	)	NO. 01-12257-PBS
<i>County of Suffolk v. Abbott Laboratories</i>	)	
<i>Inc., et al., 2:03cv229</i>	)	
_____	)	Judge Patti B. Saris

**[PROPOSED] ORDER**

COMES NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2005, upon consideration of Motion to Admit Michael Coons Pro Hac Vice, it is hereby ORDERED, ADJURED AND DECLARED that said Motion is granted and that Michael Coons may appear and practice in this court in the above-captioned matter.

\_\_\_\_\_  
United States District Judge